

Exhibit 2

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November 13, 2018

By U.S. Mail

Department of the Treasury

FOIA Request

1500 Pennsylvania Ave., N.W.
Washington, D.C. 20220

Re: Freedom of Information Act Request

Dear FOIA Officer:

My law firm represents over 350 American veterans and civilians, and their families (including over 50 Gold Star Families), in connection with deaths and injuries caused by terrorists in Iraq. On behalf of our clients, we filed a lawsuit against pharmaceutical and medical device companies that contracted with the Iraqi Ministry of Health, alleging that they funded terrorists who killed or wounded thousands of Americans in Iraq. As part of our investigation of these allegations, and on behalf of our clients who have made great sacrifices in connection with America's involvement with Iraq, we submit this request under the Freedom of Information Act, 5 U.S.C. §§ 552, *et seq.* ("FOIA") for copies of the records described below.

Background

Beginning on or about April 2004, United States Special Operations Command ("USSOCOM") created and hosted the **Global Synchronization Conference ("GSC")**, a biannual conference co-led by the Treasury Department and held each April and October from 2004 through 2009 (and in subsequent years).¹ As part of the GSC, USSOCOM sought "participation from the Geographic Combatant Commanders" and "invited participation from the J3 and J5 staffs and various entities in the **Office of the Secretary of Defense Staff**," including "the **Defense Security Cooperation Agency**."² Other GSC participants included the **State Department**, the **Department of Homeland Security**, and the **National Center for Counterterrorism**.³ As USSOCOM's Lieutenant General David Fridovich (Commander, Center for Special Operations) explained during a March 11, 2009 congressional hearing,

¹ Maj. Gen. Richard Comer (USAF-Ret), *Fighting Global War on Terror Indirectly*, Defense Media Network (Oct. 21, 2010) (available at <https://www.defensemedianetwork.com/stories/fighting-global-war-terror-indirectly/>).

² *Id.*

³ *Id.*

“semiannually, in April and in October, [SOCOM] hold[s] **global synchronization conferences** that bring together communities of interest” to, among other tasks, combat “terror finance.”⁴

The GSC included meetings of the **Threat Finance Working Group** (“TFWG”). In a statement presented at the same congressional hearing, Fridovich wrote: “semi-annually, in April and October, [USSOCOM] convene[s] a **Threat Finance Working Group as part of our Global Synchronization Conference**.”⁵ The TFWG brought “together roughly 100 Counterthreat Finance analysts, investigators, and case agents from all the Geographic Combatant Commands, Functional Commands like Strategic Command and Joint Forces Command, the Combat Support Agencies,” and other government agencies, “most notably **Treasury, State, FBI, DEA, and DHS/ICE**.”⁶ The TFWG pooled “and operationaliz[ed] each agency’s unique knowledge, skills and authorities to maximize impact on financial facilitators.”⁷

The GSC – particularly the TFWG – sought to identify and degrade financial networks used by militant and/or terrorist groups operating in Iraq from 2004 through 2009. Such organizations included **Jaysh al-Mahdi**, a Shiite terrorist group led by anti-American cleric **Muqtada al-Sadr**. By 2004, Jaysh al-Mahdi used its control over the **Iraqi Ministry of Health** to finance its operations, including attacks on American and Coalition forces.

Records Requested

From **July 1, 2003 through December 31, 2011**, all documents, communications, reports, analyses, notes, memoranda, financial data, and any other records (including drafts) generated, drafted, prepared, created, authored, reviewed, or relied upon by the **Threat Finance Working Group of The Global Synchronization Conference**, or its members, representatives, or agents, regarding any of the following:

- a. The **Iraqi Ministry of Health**; or
- b. **Jaysh al-Mahdi** (a/k/a Jaysh al-Mehdi, Jaish al-Mahdi, The Mehdi Army, The Mahdi Army, the Mahdi Militia, or JAM); or
- c. **Muqtada al-Sadr** (a/k/a Muqtada Sadr, or Moktada al-Sadr)

Please search for responsive records regardless of format, medium, or physical characteristics. Where possible, **please produce records electronically in PDF format**. We

⁴ Statement of, and testimony from, Lt. Gen. David P. Fridovich, *Tracking and Disrupting Terrorist Financial Networks: A Potential Model for Interagency Success?*; Hearing Before the H. Comm. on Armed Services, 111th Cong. 14 (Mar. 11, 2009) (available at https://fas.org/irp/congress/2009_hr/financial.pdf) (emphasis added).

⁵ *Id.* at 48 (emphasis added).

⁶ *Id.* (emphasis added).

⁷ *Id.*

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seek records of any kind, including electronic records, audiotapes, videotapes, and photographs. Our request includes any letters, emails, facsimiles, telephone messages, voice mail messages, and transcripts, notes, or minutes of any meetings, telephone conversations, discussions, and any attachments to such records. If any of this information is currently classified or restricted distribution, we ask that you submit the records for declassification in accordance with Executive Order 13526, and all other relevant regulations, policies and orders governing declassification.

5 U.S.C. § 552(b) prescribes the process for any responsive records, or portions of records, you deem covered by a FOIA exemption: “[a]ny reasonably segregable portion of a record shall be provided...after deletion of the portions which are exempt under this subsection. The amount of information deleted, and the exemption under which the deletion is made, shall be indicated on the released portion of the record, unless including that indication would harm an interest protected by the exemption in this subsection under which the deletion is made. If technically feasible, the amount of the information deleted, and the exemption under which the deletion is made, shall be indicated at the place in the record where such deletion is made.”

I am willing to pay fees for this request up to a maximum of \$200. If the fees for this request exceed that amount, please inform me first.

Thank you for addressing this request. Do not hesitate to contact me with any questions or concerns, and please mail responsive materials to the address in the letterhead above.

Sincerely,

A handwritten signature in black ink, appearing to be "Dustin M. Lee", written in a cursive style.

Dustin M. Lee
dustin.lee@sparacinopllc.com